

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TRUSTEES OF THE SUBURBAN TEAMSTERS )  
OF NORTHERN ILLINOIS WELFARE AND )  
PENSION FUNDS, )

Plaintiffs, )

v. )

JULIE COTTER, Individually and d/b/a JAC )  
Trucking, Inc., an Illinois corporation not in good )  
Standing, )

Defendant. )

Case No.: 2011 C 3815

Judge Bucklo

Magistrate Judge Nolan

**MOTION FOR JUDGMENT IN SUM CERTAIN**

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on June 5, 2011 for collection of delinquent contributions plus attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Service was made upon Julie Cotter, Individually and d/b/a JAC Trucking, Inc., an Illinois corporation not in good standing on June 12, 2011 and a copy of the proof of service was filed with the court on June 20, 2011.
3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$6,012.53 Pension  
\$9,757.90 Welfare  
\$925.00 Attorneys fees  
\$406.00 Court costs  
\$17,101.43

WHEREFORE, Plaintiff prays for:

1. Entry of judgment against Defendant, Julie Cotter, Individually and d/b/a JAC Trucking, Inc., an Illinois corporation not in good standing, and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS in the amount of \$17,101.43.

TRUSTEES OF THE SUBURBAN TEAMSTERS  
OF NORTHERN ILLINOIS WELFARE AND  
PENSION FUNDS

s/John J. Toomey  
ARNOLD AND KADJAN  
19 W. Jackson Blvd., Suite 300  
Chicago, IL 60604  
Telephone No.: (312) 236-0415  
Facsimile No.: (312) 341-0438  
Dated: July 8, 2011